

UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO

In re:	)	CASE NO. 19-17117
	)	Chapter 13
JEFFREY A. COFFMAN	)	
KRISTEN M. COFFMAN	)	JUDGE ARTHUR I. HARRIS
	)	
Debtor.	)	
	)	

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DEBTORS' RESPONSE TO MOTION OF FREEDOM  
MORTGAGE CORPORATION FOR RELIEF FROM STAY

NOW COME Jeffrey A. Coffman and Kristen M. Coffman ("Debtors"), by and through their legal counsel, and for their response to the Motion of Freedom Mortgage Corporation for Relief from Stay (ECF No. 23) hereby allege as follows:

1. Debtors principal residence is 377 Norwich Drive, Broadview Heights, Ohio 44147 (the "Property").
2. On March 14, 2019, Freedom Mortgage Corporation commenced Case No. CV 19 912562 in the Court of Common Pleas for Cuyahoga County, Ohio to foreclose a mortgage it held on the Property.
3. The Property was sold by the sheriff at judicial sale on October 21, 2019.
4. Before the sale was confirmed, Debtors filed this case for relief under Chapter 13 of the Bankruptcy Code.
5. In Ohio, a foreclosure sale is not final until the state court has judicially determined that the sale was legally sufficient, and the statutory right to redeem a property continues until the sale is confirmed.

6. Because the state court has not confirmed the sale, Debtors may reinstate the mortgage, decelerate the indebtedness, and cure the default on the mortgage through their chapter 13 plan.

WHEREFORE, Debtors respectfully move this Court to deny the Motion of Freedom Mortgage Corporation for Relief from Stay.

Respectfully submitted,  
ANTHONY & ZOMOIDA, LLC

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Attorney for Debtors

CERTIFICATE OF SERVICE

I certify that, on February 13, 2020, a true and correct copy of this Response to Motion of Freedom Mortgage Corporation for Relief from Stay was served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

Lauren A. Helbling, Chapter 13 Trustee, at [ch13trustee@ch13cleve.com](mailto:ch13trustee@ch13cleve.com)

Edward A. Bailey, Counsel for Freedom Mortgage Corporation, at [bknotice@reimerlaw.com](mailto:bknotice@reimerlaw.com)

LeAnn E. Covey, Counsel for Freedom Mortgage Corporation, at [lcovey@clunkhoose.com](mailto:lcovey@clunkhoose.com)

Shannon M. McCormick, Counsel for New Hampton Master Association, Inc., at [bankruptcy@kamancus.com](mailto:bankruptcy@kamancus.com)

And by United States regular mail, postage prepaid, upon:

PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541

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